

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

**PINNACLE PACKAGING  
COMPANY, INC.,**  
an Oklahoma corporation,  
**POLO ROAD LEASING, LLC,**  
an Oklahoma limited liability company,  
and  
**J. SCOTT DICKMAN,**

Plaintiffs,

v.

**CONSTANTIA FLEXIBLES GmbH**, an  
Austrian corporation, and  
**ONE EQUITY PARTNERS (EUROPE)  
GmbH**

Defendants.

Case No. 4:12-CV-00537-JED-TLW

**DECLARATION OF THOMAS UNGER**

Pursuant to 28 U.S.C. § 1746, Thomas Unger declares as follows:

1. I am Chief Executive Officer of Constantia Flexibles GmbH (“Constantia”). I submit this Declaration in support of Defendants’ motion for a protective order (the “Motion”) related to Plaintiffs’ deposition notices of myself and Constantia filed in the above-captioned lawsuit. This Declaration is based on my personal knowledge.
2. I have reviewed Plaintiffs’ Opposition to Defendants’ Motion for a Protective Order (the “Opposition”). A number of statements in the Opposition are incorrect.
3. I am not an officer of Global Packaging USA Corporation or any other U.S. company.
4. I do not currently have any trips planned to the U.S. for the remainder of 2015.

5. In addition, I do not frequently visit Constantia's U.S. subsidiaries. There is a separate executive board member for the North American entities.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Vienna, Austria  
July 21, 2015

Thomas Unger